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Illinois Commerce Commission)
On Its Own Motion)

-vs-)

Docket No. 00-0700

Illinois Bell Telephone Company, d/b/a)
Ameritech Illinois)
Investigation into Tariff Providing)
Unbundled Local Switching with)
Shared Transport)

INITIAL BRIEF OF

GLOBAL CROSSING LOCAL SERVICES, INC.

August 30, 2001

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INITIAL BRIEF OF
GLOBAL CROSSING LOCAL SERVICES, INC.

Now comes Global Crossing Local Services, Inc. ("Global Crossing"), by and through its attorneys, Giordano & Associates, Ltd., and hereby submits this Initial Brief in the above-captioned matter to the Illinois Commerce Commission (the "Commission" or "ICC").

I. INTRODUCTION

By its own motion filed on November 1, 2000, the Commission initiated this docket to investigate certain issues relating to the August 24, 2000 tariff filing (the "Permanent Tariff") of Illinois Bell Telephone Company, d/b/a Ameritech Illinois ("Ameritech"). The Permanent Tariff provides unbundled local switching with shared transport ("ULS-ST"). The issues under investigation in this docket are as follows:

- 1) Whether the costs and rates set forth in the Permanent Tariff comply with prior ICC and Federal Communication Commission ("FCC") orders;
- 2) Whether Ameritech's restriction of shared transport to local exchange traffic is appropriate; specifically, whether shared transport should be available for use by competitive local exchange carriers ("CLECs") in transporting their intraLATA toll traffic; and
- 3) Whether Ameritech's restriction on ordering new and additional (i.e., second line) loops in combination with ULS-ST is appropriate and should be maintained.

(Ill. C.C. Docket No. 00-0700, Order dated November 1, 2000, at 2).

The purpose of Global Crossing's Initial Brief is to address certain aspects of (a) the first subject of investigation, i.e., whether the Permanent Tariff complies with prior ICC and FCC orders, and (b) the third subject of investigation, whether Ameritech's restriction on ordering new and additional lines is appropriate and should be maintained. It is Global Crossing's understanding that the Staff of the Commission and other intervenors (including other CLECs) in this Docket are also addressing various issues regarding the costs and rates set forth in the Permanent Tariff, as well as the subject of investigation referred to as item 2, above.

II. THE PERMANENT TARIFF DOES NOT COMPLY WITH THE PRIOR TELRIC ORDER OF THE ILLINOIS COMMERCE COMMISSION BECAUSE

IT DOES NOT CLEARLY DELINEATE THE RATE ELEMENTS OF THE UNE-P.

In 1996, the Commission initiated Docket No. 96-0486 to investigate Ameritech's cost studies and establish rates for the provision of unbundled network elements ("UNEs"). Subsequently, the Commission initiated Docket No. 96-0569 to investigate Ameritech's September 27, 1996 tariff filing. Dockets 96-0486 and 96-0569 were later consolidated, and on February 17, 1998 the Commission entered its Second Interim Order in Docket No. 96-0486/0569 (Consolidated) (the "TELRIC Order"). Under the TELRIC Order, Ameritech was directed to ensure that all tariff provisions relating to rate elements for UNEs be specific and clear as to how and when these charges apply. (TELRIC Order, at 90).

The record in this Docket includes Global Crossing's Cross/Alexander Exhibit 1, Ameritech's response to Global Crossing's First Set of Data Requests. (For the Commission's convenience, Global Crossing's Cross/Alexander Exhibit 1 is attached to this brief as Attachment 1.) As Global Crossing's Cross/Alexander Exhibit 1 clearly shows, the rate elements that may apply to the UNE-Platform ("UNE-P") are widely dispersed throughout various sections of Ameritech's tariffs. This dispersion of rate elements darkens rather than dispels confusion as to which rate elements apply to the UNE-P. A CLEC ordering the UNE-P must perform a painstaking review of Ameritech's tariffs in order to determine the applicable rate elements, but even that review provides no assurance that all of the elements have been correctly identified, or that inapplicable rate elements have been eliminated.

The importance of correctly identifying applicable rate elements cannot be underestimated because these charges form the foundation for the CLEC's entry into the telecommunications market in Illinois. The consequences of an error are obvious: If the CLEC does not include a particular rate element in its calculation of the retail price for the UNE-P, then its pricing to end-users will be too low to reflect charges properly payable to Ameritech for the UNE-P, and the CLEC's profits will be adversely affected. Similarly, if a CLEC includes in its calculation of a retail price a rate element that does not apply, then it will be at a competitive disadvantage relative to other CLECs in the market who have correctly excluded that inapplicable charge from their pricing of the same or similar products to end users. For a CLEC, this situation is no different than that of a seller of any other product lacking sufficient data to determine its cost of goods sold. Ameritech's wide scattering of rate elements among its tariffs and the lack of clarity as to their application deprives the CLECs of material pricing information and defies the Commission's TELRIC Order.

Fortunately, Ameritech's Response to Global Crossing's First Set of Data Requests has been made a record set in this case because it contains a listing of various rate elements that apply to the UNE-P. On cross examination, Ameritech witness Alexander, who is the witness responsible for Ameritech's responses to those data requests, testified that he would not change any of Ameritech's responses. (Transcript at 255-59). Ameritech witness Alexander also testified that the rate elements listed in paragraphs (a) through (p) in Global Crossing's Data Request No. 1 are the only rate

elements that apply to a migration¹ of existing 2-wire basic service unbundled loop with unbundled local switching and shared transport. (Transcript at 259-60).

In order to make the Permanent Tariff comply with the TELRIC Order, Global Crossing requests that the Commission enter an order in this docket specifying that, as admitted in Ameritech's response to Global Crossing's First Set of Data Requests No. 1, the only rate elements that apply to a migration of existing UNE-P consisting of a 2-wire basic service unbundled loop with ULS-ST are the following:

- a. Loop Service Order Charge, nonrecurring charge ("NRC") per order (Ill. C.C. No. 20, Part 19, Section 2, 1st Rev. Sheet No. 8);
- b. 2-Wire Basic Loop: monthly recurring charge ("MRC") based on Loop Area (i.e., area A, B or C) (Ill. C.C. No. 19, Section 2, 2nd Rev. Sheet No. 7);
- c. ULS-ST Basic Port Service Order Charge: NRC per occasion (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 41);
- d. ULS-ST Basic Line Port: NRC per port (Ill. C.C. No. 20, Part 19, Section 3, 1st Rev. Sheet No. 40);
- e. Daily Usage Feed, charge per message (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- f. ULS-ST Service Coordination Fee, MRC per bill per switch (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- g. ULS Billing Establishment Charge, if applicable, NRC per carrier per switch (Ill. C.C. No. 20, Part 19, Section 3, Orig. Sheet No. 42);
- h. ULS Originating Usage, charge per minute of use ("MOU") (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- i. ULS Terminating Usage, charge per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);

¹ Ameritech's response to Global Crossing's First Set of Data Requests, No. 4, which is included in Attachment 1 to this brief and comprises part of the record in this case, states that the terms "migrate" and "migration" include both conversion of an end user's existing working service to an existing UNE-P combination and conversion of working resale lines to the UNE-P.

- j. ULS-ST Blended Transport Usage, charge per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- k. ULS-ST Common Transport Usage, charge per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- l. ULS-ST Tandem Switching Usage, charge per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- m. ULS-ST Reciprocal Compensation, charge per MOU (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- n. ULS-ST SS7 Signaling Transport, charge per message (Ill. C.C. No. 20, Part 19, Section 21, 1st Rev. Sheet No. 45);
- o. Ameritech Cross-Connection Service, MRC per cross-connect (Ill. C.C. No. 20, Part 23, Section 4, 1st Rev. Sheet No. 46); and
- p. Loop Service Coordination Fee, MRC per bill per central office (Ill. C.C. No. 20, Part 19, Section 2, 1st Revised Sheet No. 8).

Global Crossing does not agree with, or waive any objections to, the charges specified by Ameritech for many of the elements listed above and notes that several of these charges (e.g., applicability and costs for the loop service ordering charge and basic port service ordering charge) are being investigated both in this docket and in Ill. C. C. Docket No. 98-0396. The Commission's order should provide that both the applicability and price of these rate elements would be subject to final orders of the Commission. Subject to those qualifications, an order by the Commission to this effect would provide to UNE pricing a measure of clarity and certainty that Ameritech's tariffs have so long withheld.

**III. AMERITECH'S RESTRICTION ON ORDERING NEW AND
ADDITIONAL LINES IS NOT APPROPRIATE AND SHOULD NOT BE
MAINTAINED.**

In this part of its brief, Global Crossing argues that (a) at the most fundamental level, Ameritech's refusal to provision new and additional lines to CLECs places the CLECs at a competitive disadvantage relative to Ameritech, (b) Ameritech's proposed UNE frame method of access under which CLECs combine network elements is discriminatory, and (c) the rate elements for new and additional UNE-P should be the same as those for existing UNE-P, with the exception of the line connection charge, and subject to final orders of the Commission on the level and applicability of all such rate elements.

A. Ameritech's Restriction on Ordering New and Additional Lines Prevents CLECs from Competing with Ameritech on an Equal Footing.

Throughout this proceeding, Ameritech has maintained that it is not obligated to provision new or additional lines to CLECs. Ameritech has testified that it has no obligation, and indeed cannot be required, to combine network elements for CLECs. (Ameritech Exhibit 3.0 (Alexander), p. 4, ll. 10-14; p. 7, l. 13 to p. 8, l. 4). Ameritech has also testified that it is not possible for a CLEC to order a new line for that CLEC's end user under Ameritech's current tariffs. (Transcript at 275). In plain terms, Ameritech's refusal to provision new or additional lines to CLECs prevents the CLECs from offering this service to their own end users, and thereby prevents the CLECS from competing with Ameritech on an equal footing. The record in this case contains extensive testimony by Commission Staff, CLEC and Ameritech witnesses on this issue. In addition, issues on the provisioning of new and additional lines have also been raised in Ill. C.C. Docket No. 98-0396.

Ameritech's restriction on provisioning new or additional lines is best viewed in the harshest and simplest light: Unless a CLEC can offer the same kinds of telecommunications service that Ameritech offers to its end user customers on a nondiscriminatory basis, the telecommunications market in Illinois will always be biased against telecommunications competition and in favor of Ameritech. Under Ameritech's restriction, a CLEC simply will not be able to provision a new or additional telephone line to an end user customer without incurring costs that Ameritech would not itself incur in provisioning the same service to that end user. This is the antithesis of provisioning UNEs on a nondiscriminatory basis.

The Commission has full authority under Section 13-505.5 of the PUA to order that Ameritech provision new and additional lines to CLECs. (220 ILCS 5/13-505.5). Ameritech's refusal to provision new and additional lines is based on a legal theory that Ameritech derives from Iowa Utility Board v. FCC, 219 F.3d 744 (8th Cir. 2000). (Ameritech Exhibit 3.1 (Alexander), p. 3, l. 15 – p. 4, l. 15; p. 6, ll. 4-13). Nothing in the record in this case evidences any technical or economic grounds for the refusal to provision new and additional lines, and in fact Ameritech has in this docket offered to provision new and additional lines under a Section 271 interconnection agreement amendment that is conditional on this Commission's finding that this amendment meets the combination requirements for 271 checklist approval. (Ameritech Exhibit 3.1 (Alexander), p. 7, l. 16 – p. 8, l. 2). Furthermore, the provisioning of such a telecommunications service is clearly not contrary to the public interest.

Ameritech's arguments in support of this restriction are at once specious and complex, but the remedy available to the Commission is straightforward. The

Commission should order that Ameritech revise its tariffs to eliminate any restriction on the provisioning of new and additional lines, and to replace the terms "currently combined" or "existing" whenever those terms are used to modify any reference to a UNE combination, with the term "existing or new."

B. Ameritech's Restriction on Provisioning New and Additional Lines
Results in the Imposition of Collocation Costs on Non-Collocated CLECs.

Ameritech's Permanent Tariff provides that collocation will not be required for the provisioning of the existing UNE-P. (Ill. C.C. No. 20, Part 19, Section 21, Original Sheet No. 31). In addition, Ameritech witness Alexander testified that collocation is not necessary in order for existing UNE-P to be provisioned to a CLEC. (Transcript at 240-41). However, a direct consequence of Ameritech's refusal to provision new and additional (or second) lines to CLEC customers is the imposition of what amount to collocation costs on non-collocated CLECs that plan to provide new or additional lines to end users through the UNE-P.

Ameritech's witness Alexander testified that in order to obtain new or additional UNE-P, a non-collocated CLEC would have to combine network elements itself under the UNE frame method of access in a central office. (Transcript at 242). Tie cabling would be extended from Ameritech's main distribution frame ("MDF") to a UNE frame, or intermediate distribution frame ("IDF"). (Transcript at 242-47). Ameritech would reserve space in the central office as a combining area so that the CLECs could combine the UNEs themselves. (Transcript at 242-47). Ameritech's witness Alexander also testified that Ameritech will require reimbursement for costs of space on the IDF,

whether through a leasing arrangement for space on the IDF, or through some other means of recovering the costs of the combining area and IDF through pricing of the arrangement. (Transcript at 286-87).

Ameritech admitted that the cost of having the CLECs combine the elements in this manner for new and additional lines is greater than the cost Ameritech would incur if it combined the elements for a new UNE-P at the request of one of the CLECs:

Q. ...I'm talking about which one costs Ameritech more to do? Because in both you've got to provision a loop. Right? That's the same. In both you've got to do central office work. That's the same. In one you just extend, from my limited engineering background, you just basically run a jumper on the MDF, connect with a loop, and send it out to the residence. On the other you've got this entire UNE frame that you've got to install and then bring in a CLEC to do the hookups. It seems like when we start talking about new frames, that gets more costly overall, just in terms of pure economic costs, not netting, not with the idea that you're going to get reimbursed for your costs, but from a pure cost-causation [perspective] it seems a lot more costly to stick a new frame in one of your offices than it does to just do it yourself, and I just wonder why.

A. Well, I haven't studied the costs of let's say a CLEC requesting Ameritech to combine let's say 1,000 UNEs and maybe rearrange those things versus this cost of the CLEC doing it themselves, but if you're asking me is there a cost – some cost to create a combining area, the answer is yes. There is some cost to create a combining area.

(Transcript at 292-93).

Ameritech thus admits that there will be costs incurred for installing an IDF, running tie cabling from the MDF to the IDF, and reserving some amount of space in the Ameritech central office for a CLEC combining area. Ameritech also states that it intends to recover those costs from non-collocated CLECs that combine UNEs under this method. It is not known what these costs are, and Ameritech has asserted that it has no obligation to tariff these charges. (Ameritech Exhibit 3.1 (Alexander), p. 27, ll. 14-17)

The leasing or other cost recovery arrangement that Ameritech plans to use in order to let a non-located CLEC combine UNEs itself necessarily implies some type of interest in, or control of, a network component such as frame equipment, which makes the UNE frame method of access to UNEs indistinguishable from collocation.

Sections 251(c)(3) and 252(d)(1) of the Federal Telecommunications Act of 1996 ("TA96") each impose on an ILEC the obligation to provide competitive telecommunications carriers with nondiscriminatory access to network elements. Further, Section 271(c)(2)(B)(ii) of TA96 requires Bell operating companies seeking in-region interLATA authority to provide "nondiscriminatory access to network elements in accordance with the requirements of Sections 251(c)(3) and 252(d)(1) of TA96.

Ameritech's restriction on provisioning new and additional UNE-P compels a non-located CLEC to use the UNE frame method of access described above. Ameritech will then seek to recover from that CLEC the costs of preparation and installation of the IDF, tie cabling from the MDF to the IDF, and the combining space, even though the CLEC is not located. Regardless of the precise amount of the costs, Ameritech seeks to impose on a non-located CLEC costs that Ameritech, as an ILEC, does not itself incur in order to provide the same telecommunications service to an end user over the same combination of network elements. This arrangement is contrary to the requirement of Sections 251(c)(3) and 252(d)(1) of TA96 that access to network elements be nondiscriminatory. Further, the imposition of these costs in multiple central offices of Ameritech will drive up costs for a non-located CLEC, thereby impeding competition.

The newly amended Illinois Act also provides that collocation is not required as part of the UNE-P, whether for existing or new telecommunications service. Section 13-

801(d)(4) of the PUA provides that a telecommunications carrier may use a network elements platform consisting solely of combined network elements of the incumbent local exchange carrier to provide end-to-end telecommunications service, without the requesting carrier's provision or use of any other facilities or functionalities. (220 ILCS 5/13-801(d)(4)).

Under Section 5/13-801(d)(3), the ILEC is required to combine any sequence of UNEs that it ordinarily combines for itself, which covers new and additional UNE-P. (220 ILCS 5/13-801(d)(3)). Section 5/13-801(d)(3) also provides that an ILEC may recover from the requesting telecommunications carrier special construction costs incurred in combining such network elements. (220 ILCS 5/13-801(d)(3)). However, a special construction cost cannot be recovered unless it satisfies all the criteria set forth in Section 13-801(d)(3)(i) through (iii) of the PUA. These criteria include the requirement that the special construction cost sought to be recovered is one that the ILEC charges to its own retail telecommunications end users. (220 ILCS 5/13-801(d)(3)(ii)). Since new and additional lines for Ameritech's own retail customers are combined on the MDF, the costs of the UNE frame method of access that Ameritech seeks to recover from CLECs is not imposed on Ameritech's own retail end users, and therefore the criterion in Section 13-801(d)(3)(ii) of the PUA is not met. Therefore, such costs cannot be recovered from the non-located CLEC as special construction charges.

The ILEC's obligation to combine network elements under Section 13-801(d)(3) and to provide the UNE-P without collocation under Section 13-801(d)(4) obviate the IDF, tie cabling and combining space arrangements for non-located

telecommunications carriers. Therefore, the imposition of such costs on non-located carriers is unjust, unreasonable, and contrary to applicable law.

For these reasons, the Commission should order that Ameritech must provision both existing and new lines to telecommunications carriers without the imposition of what amount to collocation costs on a non-located CLEC.

C. The Rate Elements for New and Additional UNE-P Should be the Same as Those for Existing UNE-P, Plus the Line Connection Charge.

Global Crossing has sought to determine the specific rate elements that apply to both existing, as well as new or additional UNE-P. Throughout this proceeding Ameritech has maintained its artificial distinction between existing UNE-P on the one hand, and new and additional UNE-P on the other, based on Ameritech's view that it has no obligation to provision the latter. (Section II.A of this brief, above). The legitimacy of Global Crossing's objective has been ratified by the newly-enacted Section 13-801 of the PUA, which requires not only that Ameritech, as an ILEC, provision new and additional telecommunications services, but also that Ameritech provide a statement of applicable rate elements that pertain to a proposed order identified by the competitive local exchange carrier. (PUA Sections 13-801(d) and 13-801(i)). The ILEC's obligation to provide a listing of rate elements under Section 13-801(i) of the PUA is not restricted to existing UNE-P.

As requested above in Section I of this brief, in connection with the rate elements applicable to existing UNE-P, Global Crossing requests that the Commission enter an order in this docket specifying that the only rate elements that apply to a new or additional UNE-P consisting of a 2-wire basic unbundled loop with unbundled local

switching and shared transport, are the same as those that apply to the existing UNE-P, with the sole addition of the Line Connection Charge, as set forth below:

Line Connection Charge, NRC per termination (Ill. C.C. No. 20, Part 19, Section 2, 1st Rev. Sheet No. 8).

As stated in Section I of this brief, Global Crossing does not agree with the charges specified by Ameritech for many of the elements listed above, and notes that several of these charges are being investigated both in this docket and in Ill. C. C. Docket No. 98-0396. The Commission's order should provide that both the applicability and price of these rate elements would be subject to final orders of the Commission.

IV. CONCLUSION

WHEREFORE, for all of the above legal and policy reasons, Global Crossing Local Services, Inc. respectfully requests that the Commission:

(1) Find that Ameritech's Permanent Tariff does not comply with the Commission's prior TELRIC Order because the tariff provisions relating to rate elements for UNEs are not specific and clear as to how and when those charges apply;

(2) Find that the only charges applicable to migrations of existing UNE-P consisting of 2-wire basic unbundled loop with ULS-ST are those specified in Section II of this brief, subject to final orders of the Commission in this and other pending dockets as to the level and applicability of such charges;

(3) Find that Ameritech's restriction on ordering new and additional lines (i.e., second lines) is not appropriate and should not be maintained;

(4) Find that the only charges applicable to the ordering of new and additional UNE-P consisting of 2-wire basic unbundled loop with ULS-ST are the same as those that apply to existing UNE-P, except for the Line Connection Charge referred to in Section III.C of the brief, and subject to final orders of the Commission in this and other pending dockets as to the level and applicability of such charges;

(5) Require that Ameritech amend its tariffs to eliminate any restriction on the provisioning of new and additional lines, and to replace the terms "currently combined" or "existing" when used as modifiers of any UNE combination with the term "existing or new"; and

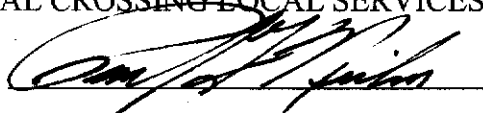
(6) Reject as a discriminatory charge any attempt by Ameritech to recover from non-collocated CLECs the costs of Ameritech's UNE frame method of providing access to CLECs to combine UNEs.

For the Commission's convenience, attached to this brief as Attachment 2 are draft ordering paragraphs that give effect to the foregoing requests.

Respectfully submitted,

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STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission
On Its Own Motion

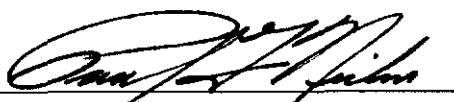
-vs-

Illinois Bell Telephone Company, d/b/a
Ameritech Illinois
Investigation into Tariff Providing
Unbundled Local Switching with
Shared Transport

Docket No. 00-0700

NOTICE OF FILING


PLEASE TAKE NOTICE that we have on this 30th day of August, 2001 filed with the Chief Clerk of the Illinois Commerce Commission, 527 East Capitol Avenue, Springfield, Illinois, by FedEx the Initial Brief of Global Crossing Local Services, Inc., a copy of which is hereby served upon you.


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CERTIFICATE OF SERVICE

I, Paul G. Neilan, an attorney, HEREBY CERTIFY that copies of the above Notice, together with copies of the document referred to therein, have been served upon the parties to whom the Notice is directed, electronically (e-mail) and by first class mail, postage prepaid, from Chicago, Illinois, on this 30th day of August 2001.

A handwritten signature in cursive script, appearing to read 'Paul G. Neilan', is written over a horizontal line.

Paul G. Neilan

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